



June 27, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, N.W.
Washington D.C. 20554

**Re: Certification for Stage 1 Funding
Uniendo a Puerto Rico Fund
WC Docket Nos. 18-143, 10-90 and 14-58**

Dear Ms. Dortch:

VPNet, Inc. ("VPNet") respectfully submits the attached Certification in response to the Commission's Order released on May 29, 2018 in the above-referenced proceeding inviting providers of Internet service to participate in Stage 1 of the Uniendo a Puerto Rico fund (the "Stage 1 Order"). VPNet very much appreciates the Commission's efforts to establish a funding mechanism to aid in the restoration and expansion of communication networks in Puerto Rico following the extensive damage caused by Hurricanes Irma and Maria in 2017. VPNet welcomes the opportunity to participate in this important program.

Background

Founded in 2008 and based in Cidra, Puerto Rico, VPNet is a privately owned provider of fixed wireless broadband services in rural areas of Puerto Rico. It provides a variety of Information Technology and Telecommunication related services, with an emphasis on providing primary and redundant services to commercial and residential clients located in rural areas throughout the island.

VPNet's operations, infrastructure, equipment and customer base were affected by the windstorms and damage caused by Hurricanes Irma and Maria. Over the last six months, VPNet has focused on rebuilding and returning to normal operating conditions, primarily relying on its own resources to do so and without outside financial support. As of today, approximately 95% of VPNet's customers have resumed their regular commercial services.

VPNet has taken substantial strides and expended significant resources to resume operations. However, VPNet's ability to return to full normalcy remains predicated on the availability of resources to quickly complete the rebuild of its operating network and security centers as well as its backbone, and expeditiously install new customer premise equipment. Further, this ability is also dependent on our customers' ability to promptly recover as well.

VPNet has not previously relied on federal or state support, capital or credit relationships with local commercial banks or other financing venues; its growth has instead been funded with capital from the founders, excellent credit terms extended by our main suppliers, and over the years, by VPNet's positive cash flow from operations. However, access to liquidity is now a challenge, particularly in light of the upcoming 2018 hurricane season.

VPNet, Inc.
FCC – Uniendo a Puerto Rico Fund Certification

Stage 1 Order Requirements

As confirmed in the attached Certification, as reported on its FCC Form 477, VPNet provided broadband Internet access service to subscriber locations as of June 30, 2017. This total reflects VPNet's provision of service to business customers, many of which have multiple locations. To corroborate the number of locations, attached is a spread sheet showing the geographic coordinates for the subscriber locations where VPNet installed equipment and provided fixed broadband service as of June 30, 2017.

Upon its selection for funding under the Uniendo a Puerto Rico Fund, VPNet will promptly file for designation as an eligible telecommunications carrier in Puerto Rico and provide such designation to USAC. VPNet also will use funds in a manner consistent with the Stage 1 Order and understands it will be subject to 2018 USAC audits.

Looking Forward

In the aftermath of Hurricanes Irma and Maria, the impact on VPNet's infrastructure now requires that VPNet seek, consistent with the Stage 1 Order, external funding to acquire the necessary equipment to harden and expand its network and infrastructure, install new antennas in existing towers and equipment to new towers capable of withstanding similar atmospheric events, and acquire and install more robust and enduring radios and electronic equipment for our customer's sites. Based on the lessons learned from last year's hurricanes, VPNet can build a stronger proprietary foundation to address certain resiliency weaknesses identified with the passing of the recent events such as independent power generators (solar or otherwise) to enable the network to remain operational.

VPNet intends to use Uniendo a Puerto Rico Fund support to build a modern, robust and more resilient backbone and acquire customer premise equipment that can withstand similar or even more severe events in the future. The equipment we strive to acquire going forward will be the type that will lessen VPNet's dependency on the Puerto Rico Electric Power Authority for its wireless network to operate, and enable VPNet to provide connectivity to our end customers - as it was proven that our network could operate on a self-sustainable solar-powered system due to its low consumption design. Lastly, based on our recent experience, VPNet plans to build a backup and recovery network throughout Puerto Rico capable of becoming the primary layer over an elongated period of time.

Please feel free to contact me at 787-600-6684 or VPNet's legal counsel Stephen Coran at 202-416-6744 if you have any questions in connection with this submission.

Respectfully submitted,

Felipe Hernandez
President & CEO

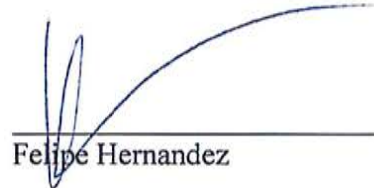
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CERTIFICATION

I, Felipe Hernandez, President and CEO of VPNet, Inc. (“VPNet”), hereby certify under penalty of perjury that the following is true and correct:

As of June 30, 2017, VPNet provided fixed broadband service to subscriber locations, as that term is defined for purposes of FCC Form 477 reporting. This subscriber location total is the same figure reported on VPNet’s Form 477 filed as of that date. To corroborate the number of locations, this Certification includes a spread sheet showing the geographic coordinates for the subscriber locations where VPNet installed equipment and provided fixed broadband service as of June 30, 2017.

Executed on June 27, 2018.



Felipe Hernandez

ATTACHMENT

SUBSCRIBER LOCATION COORDINATES